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May 7, 2024

Hon. John G. Koeltl

U.S. District Court - Southern District of New York

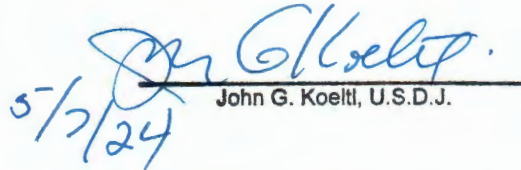
500 Pearl St.

New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

Re: *U.S. v. Foley, et. al.* 23 cr 664 (JGK)

Dear Judge Koeltl:


John G. Koeltl, U.S.D.J.

I am counsel for Erin Foley, a defendant in the above referenced matter.

Please accept this letter in lieu of a formal motion requesting a temporary modification of the travel conditions in Ms. Foley's bond.

Currently her travel is restricted to the Southern District of Florida (where she resides) and the SDNY (and travel points in between for court appearances). By this letter, I respectfully this condition be temporarily modified to permit to travel, on or about June 2-6, 2024 to and from the Boston area. Ms. Foley seeks to travel there with her husband and children for a family vacation.

Ms. Foley is under courtesy supervision by the U.S. Probation Office for the Southern District of Florida. I have conferred with her supervising Officer and am informed that, regarding this travel request, the Florida Office defers to the SDNY Pretrial Office. Accordingly, I conferred with SDNY Pretrial Officer Taelor Nisbeth who is the Officer assigned to Ms. Foley's case. Officer Nisbeth informs that SDNY Pretrial Services does not object to this request. I have also conferred with the Government and they defer to the position of Pretrial Services.

Wherefore, I respectfully request this application be granted. If it is granted, prior to her travel, Ms. Foley will provide her itinerary to her supervising Pretrial Officer.

Respectfully submitted,

/s/

Jeffrey G. Pittell

cc: Rushmi Bhaskaran, AUSA